

BellSouth Telecommunications, Inc.

Legal Department

1600 Williams Street

Suite 5200

Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner

General Counsel-South Carolina

803 401 2900

Fax 803 254 1731

March 26, 2007

The Honorable Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Acktel Recoveries, LLC, Complainant/Petitioner v. ITC^DeltaCom
Communications, Incorporated and BellSouth Telecommunications, Inc.
Defendants/Respondents
Docket No. 2007-60-C

Dear Mr. Terreni:

Enclosed for filing are an original and one (1) copy of the Answer of AT&T South Carolina in the above-referenced matter.

By copy of this letter, I am serving all parties of record with a copy of this answer as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in cursive script that reads "Patrick W. Turner by nml".

Patrick W. Turner

PWT/nml

Enclosure

cc: All Parties of Record

DM5 # 671626

**THIS DOCUMENT IS AN EXACT DUPLICATE OF THE E-FILED COPY SUBMITTED TO THE
COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS.**

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

<i>In Re:</i> Acktel Recoveries, LLC,)	
Complainant/Petitioner)	
v. ITC^DeltaCom Communications, Inc.)	Docket No. 2007-60-C
and BellSouth Telecommunications, Inc.,)	
Defendants/Respondents)	
_____)	

ANSWER OF AT&T SOUTH CAROLINA

In compliance with the Notice that was entered in this Docket on February 23, 2007 and subsequently served upon BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina (“AT&T”), AT&T respectfully submits the following Answer to the letter complaint, dated February 23, 2007, that a representative of Acktel Recoveries, LLC (“Acktel”) filed with the Public Service Commission of South Carolina (“the Commission”).

The Complaint states Acktel’s belief that “DeltaCom should absolve [Acktel] of any charges specified in a recent bill from them” and that Acktel “is requesting a Hearing to review the actions of both [DeltaCom and AT&T] . . . to determine what remedies are available.” *See* Letter at p. 2. Accordingly, it is unclear what, if any, improper conduct is being alleged against AT&T and which, if any, remedies Acktel is seeking against AT&T. Without waiving its rights to more fully address any testimony or evidence Acktel may present in this docket, therefore, AT&T admits that Acktel placed orders to move certain telecommunications services from DeltaCom to AT&T and that AT&T representatives worked with representatives of Acktel and DeltaCom to work those

orders. AT&T denies that it or any of its representatives acted improperly or caused Acktel to suffer any damages, and AT&T denies that Acktel is entitled to any remedies against AT&T. In the abundance of caution, AT&T raises the following affirmative defenses: failure to state a cause of action upon which relief may be granted; and any and all provisions of its tariffs, including without limitation all limitations of liability set forth in Section A2 of its South Carolina General Subscriber Services Tariff.

Finally, AT&T respectfully requests that the Commission consider appointing a hearing officer to work with the parties to explore alternative methods of resolving this dispute, including without limitation mediation with the Office of Regulatory Staff, and to report back to the Commission regarding this matter prior to establishing a procedural schedule in this docket.

Respectfully submitted on this the 26th day of March, 2007.



Patrick W. Turner
1600 Williams Street, Suite 5200
Columbia, South Carolina 29201
(803) 401-2900

AT&T SOUTH CAROLINA

CERTIFICATE OF SERVICE

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for AT&T South Carolina (“AT&T”) and that she has caused the Answer of AT&T South Carolina in Docket No. 2007-60-C to be served upon the following on March 26, 2007.

Wendy B. Cartledge, Esquire
Post Office Box 11263
Columbia, South Carolina 29211
(Office of Regulatory Staff)
(U. S. Mail and Electronic Mail)

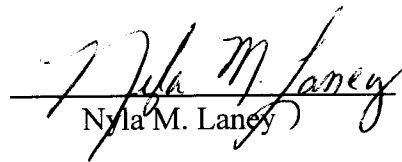
Jocelyn G. Boyd, Esquire
Staff Attorney
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(U. S. Mail and Electronic Mail)

F. David Butler, Esquire
Senior Counsel
S. C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(U. S. Mail and Electronic Mail)

Joseph Melchers
Chief Counsel
S.C. Public Service Commission
Post Office Box 11649
Columbia, South Carolina 29211
(PSC Staff)
(U.S. Mail and Electronic Mail)

Renee' T. Mulvihill
7437 College Street, Suite 103
Irmo, South Carolina 29063
(Acktel Recoveries, Incorporated)
(U.S. Mail and Electronic Mail)

Anthony Mastando, Esquire
Post Office Box 740597
Atlanta, Georgia 30374
(ITC^DeltaCom Communications, Incorporated)
(U.S. Mail and Electronic Mail)



Nyla M. Laney

DM5 # 669168